

## REMARKS

By this amendment, claims 17 and 19 are cancelled and claims 1, 5 and 15 have been amended. Claims 2, 3, 6, 9, 10, 12, 13, 16 and 18 were previously cancelled. Accordingly, claims 1, 4, 5, 7, 8, 11, 14 and 15 are currently pending in the application, of which claims 1, 5 and 15 are independent claims. Applicant respectfully submits that the above amendments do not add new matter to the application and are fully supported by the specification.

Entry of this Amendment is respectfully requested because it places the present application in condition for allowance, or in the alternative, better form for appeal. In view of the above Amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

## PRIORITY

This application claims priority from Korean Patent Application No. 1997-51339. While there is no question as to the identity between this application the Korean application and as to Korean application's sufficiency of the disclosure under 35 U.S.C. §112, certain non-essential features in this application may not be found in the Korean application. For example, the Korean application does not specifically mention the "touch pad" while describing a switch unit for moving a focus position according to the user's selection.

To help the Examiner determine the question of sufficiency of the disclosure under 35 U.S.C. §112, Applicant submit herewith (a) English translation of the certified copy of the priority Korean patent application, and (b) Statement verifying accuracy of the translation.

### **Rejections Under 35 U.S.C. §112, first paragraph**

Claims 1, 5 and 15 stand rejected under 35 U.S.C. §112, first paragraph as failing to comply with the written description requirement. Particularly, the Examiner stated that the specification does not describe "... the image data is compressed in a lossless manner ...". Applicant respectfully traverses this rejection for at least the following reasons.

In this response, claims 1, 5 and 15 have been amended to delete "in a lossless manner". Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §112, first paragraph rejection of claims 1, 5 and 15.

### **Rejections Under 35 U.S.C. §103**

Claims 1, 4, 5, 7, 8, 14, 15, 17 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 5,625,415 issued to Ueno, *et al.* ("Ueno") in view of France Patent Publication No. 2674036 issued to Mrejen ("Mrejen") and further in view of U. S. Patent No. 6,194,244. Applicant respectfully traverses this rejection for at least the following reasons.

With respect to claims 1 and 4, in this response, independent claim 1 is amended to further recite "... a focus control unit generating an address of the image data stored

*in the first image storage corresponding to a coordinates of the relocated focus position, processing the image data to set the focus position on a position of the subject corresponding to the relocated mark ...". An example of this feature is shown in Fig. 2 of the present application.*

In this regard, the Examiner stated "Ueno reference discloses generating an address of a memory (120) storing image data (pre-shooting image data) corresponding to a coordinates of focus position (1500); reading image data stored in said address, and calculating the focus position by processing said read image data as shown in Figure 18, steps 1906-1910 (See Col. 27, lines 1-15). This assertion is respectfully disagreed with.

Fig. 18 of Ueno discloses an operational flowchart of the camera system 100 but does not disclose or suggest "*a focus control unit generating an address of the image data stored in the first image storage corresponding to a coordinates of the relocated focus position*", as recited in claim 1. In fact, Ueno does not disclose or suggest the concept of the "address" in image storage. Thus, it is submitted that claim 1 is patentable over the cited references. Claim 4 is dependent from claim 1 and hence would be also patentable for at least the same reason.

With respect to claims 5, 7, 8, 14, amended independent claim 5 recites "*a focus control unit generating an address of the image data stored in the first image storage corresponding to a coordinates of the relocated focus position*". As previously mentioned, none of the cited references discloses or suggests this claimed feature. Thus, it is submitted that claim 5 is patentable over the cited references. Claims 7, 8

and 14 are dependent from claim 5 and hence would be also patentable for at least the same reason.

With respect to claims 15, 17 and 19, in this response, claims 15 is amended to incorporate the limitations of claims 17 and 19, and claims 17 and 19 are cancelled. Amended independent claim 15 recites "the step of focusing further comprising steps of: generating an address of a memory storing image data corresponding to a coordinates of the relocated focus position; reading the image data stored in the address; and calculating a focus position by processing the image data ...". As mentioned above, the cited references disclose or suggest this claimed feature. Thus, it is submitted that claim 15 is patentable over them.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 1, 4, 5, 7, 8, 14, 15, 17 and 19.

### **Conclusion**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

  
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ATTACHMENT: (a) English translation of the certified copy of Korean priority application  
(b) Statement verifying accuracy of translation

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